

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

KERRI JENKS,

Plaintiff,

v.

Case No. 1: 15-cv-1079-KBM-KK

**GEICO INSURANCE COMPANY, a foreign
Corporation, AMY TRAINOWSKI, and John Doe,**

Defendants.

STIPULATED MOTION TO DISMISS WITH PREJUDICE

Plaintiff Kerri Jenks, by and through her counsel of record, Michael Huffaker and Defendant Government Employees Insurance Company, incorrectly named as GEICO Insurance Company, by and through their counsel of record, Chapman and Charlebois, P.C. (Donna L. Chapman and Jessica C. Singer), hereby move the Court to dismiss with prejudice Plaintiff's Complaint and causes of action that were or could have been filed therein, on the ground the parties have reached a compromised settlement.

WHEREFORE, the parties respectfully request the Court enter an Order

dismissing with prejudice Plaintiff's Complaint and all causes of action that were or could have been alleged therein, with each party to bear their own attorneys' fees and costs.

Respectfully submitted,

CHAPMAN AND CHARLEBOIS, P.C.

/s/ Jessica C. Singer, Attorney at Law

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And

Approval via email 12/9/2015

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